

**United States Bankruptcy Court  
For the District of Maryland**

Petition: 23-16969

Roman Catholic Archbishop of Baltimore, Petitioner

**Motion to Dismiss Petition for Bankruptcy**

The creditor named below, as party in interest, for the above referenced petition files this Motion to Dismiss the Petition of the Debtor. The debtor, Roman Catholic Archbishop of Baltimore, has failed to cite a legal basis for the Petition of Bankruptcy to be granted by this Court and is using the bankruptcy petition to conceal its ongoing fraud by failing to fully divulge its assets. The movant is a party in interest to this matter.

**Argument**

11 U.S.C. §§ 1121 and 1125 requires the debtor to fully disclose its assets and liabilities at the start of the bankruptcy proceedings. The debtor has not disclosed all assets at the commencement of these proceedings and assets disclosed after the initiation are exempt from these proceedings.

The disclosure statements must also state, with specificity, the reasons the debtor is in bankruptcy and the reasons why voting creditors should approve any such reorganization plan. The debtor in the instant matter was not in a position to file bankruptcy prior to the enactment of the Child Victim Act and, through claims evaluation of the unsecured victim creditors, has objected to numerous claims put forth by potential unsecured creditors that serve as the sole reason for the pre-emptive petition to file bankruptcy.

The debtor has shown a predilection to hide assets from this Court and its creditors based upon subsequent motions made before this Court.

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**Relief Sought**

The Movant seeks an Order from this Court dismissing the Bankruptcy Petition of the above cited debtor. In the alternative the Movant seeks an Order from this Court citing that undisclosed assets are exempt from protection under the bankruptcy petition.

Respectfully submitted this 9<sup>th</sup> day of January 2026,

A handwritten signature in red ink, appearing to read "J.F. (Jeff) Curran", is written over a horizontal red line.

John F. Curran, Pro se Creditor

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**Certificate of Service**

A copy of the foregoing was served upon the Trustee via email. Further the Pro se Creditor relies upon service utilizing the CF/ECM system of PACER.

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John F. Curran, Pro se Creditor